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| **BG EMFAF Programme – COM observations – BG uptake - COM replies** | | | |
| **COM formal observations** | **BG uptake of the observations** | **COM replies** | **MA replies** |
| 1. We welcome the use of Financial Instruments as well as Bulgaria’s commitment to implement the collection of marine litter. In this regard, the Bulgarian authorities are recommended to specifically mention these two activities in the Programme’s Strategy, as part of the efforts to increase sectors’ resilience and to contribute to the Good Environmental Status. | Fulfilled.  The following sentences are added in the section:  **Financial instruments will be implemented under the MFP as part of the efforts to increase the resilience of the sector.**  **Good environmental status will also be achieved through marine litter collection activities.** | Please see the amended text in track changes in the Programme on page 11 to reflect better the observation regarding the good environmental status. | Fulfilled.  **Постигането на добър екологичен статус ще се постигне също и чрез дейности по събиране на морски отпадъци.** |
| 2. The Bulgarian authorities are invited to provide more detailed information on how the Programme intends to contribute to the ‘EU Mission Restore our Ocean and Waters by 2030’ objectives of marine and freshwater ecosystem preservation and restoration, zero pollution and climate neutrality or promote synergies with the mission. The reference should include the correct name (“EU Mission Restore our Ocean and Waters by 2030”) as well as mention the three objectives of the mission, i.e. reducing ocean/water pollution, decarbonisation and ecosystem regeneration. All these objectives are relevant for the healthiness of our seas and waters and EMFAF actions can contribute in synergy with Horizon Europe to the same objectives. The Bulgarian authorities are also recommended to specify, which concrete actions will contribute to the mission, as the mentioned cooperation between researchers, fishers and other stakeholders is not sufficient. | Fulfilled.  In the Strategy section, where the synergies are listed, there is a reference with the correct name: Horizon Europe – Restore our Ocean and Waters by 2030 and its three goals.  In the section - Priority 1 contribution to the EU horizontal priorities, the following is added: The achievement of good environmental status and the objectives of an EU Mission: Restore our Ocean and Waters by 2030 will be achieved through marine litter collection activities and cooperation between fishermen, researchers and other stakeholders.  In the complementarities document, the section related to EU Mission Restore our Ocean and Waters by 2030 is further developed as follows:  **Horizon Europe EU Mission Restore our Ocean and Waters by 2030**  The mission and in particular its three objectives of reducing ocean/water pollution; decarbonisation and restoration of ecosystems are important for the health of our seas and waters and the activities to be implemented under theBG EMFAF Programme can contribute in synergy with Horizon Europe to achieve them. Operations to clean waters from pollution and lost fishing gear will contribute to the cleanliness of the ocean/water. Decarbonisation processes will be supported by activities related to the RAS installation and energy efficient solutions in fisheries and aquaculture. Ecosystem restoration will be achieved through nature-based solutions to manage marine protected areas and support the management of protected areas. It will also help achieve European Green Deal objectives in marine and freshwater waters, such as the protection of 30 % of the EU’s maritime area and the restoration of marine ecosystems and 25 000 km of free-flowing rivers. The objectives of the MFP are in line with the objectives set for biodiversity in marine ecosystems, while restoring free-flowing rivers will be implemented through measures under the Natura 2000 National Priority Action Framework with a measure ‘Improving the conservation status of species by restoring longitudinal connectivity of rivers’, which includes the construction and rehabilitation of fish passages and the removal or minimisation of the impact of existing barriers with European Regional Development Fund funding. | BG is kindly asked to further elaborate the text in both the Programme strategy and the complementarities document by adding the following information:  The EU Mission: Restore our Ocean and Waters by 2030 will be supported via the following EMFAF actions contributing in synergy with Horizon Europe to the same objectives: collection of marine litter and lost fishing gear, decarbonisation of fishing vessels, landing obligation actions, use of energy efficient solutions and renewable resources in fisheries and aquaculture, RAS, investments in selective gear, strengtheningthe network of MPAs, development and implementation of MPAs management plans, scientific studies and research, and cooperation between fishers, researchers and other stakeholders. | Fulfilled.  Note taken into consideration – the title of the mission is added in the Programme Strategy section:  **Мисията Хоризонт Европа: Възстановяването на нашите океани и води до 2030 г. ще бъде подкрепена чрез няколко действия по линия на ЕФМДРА, допринасящи за постигането на същите цели във взаимодействие с ХЕ: събиране на морски отпадъци и изгубени риболовни уреди, декарбонизация, задължение за разтоварване, енергийно ефективни решения и възобновяеми ресурси, селективни уреди, укрепване на мрежата от МЗЗ, разработване и изпълнение на планове за управление на МЗЗ.**  The text is also added in the Complementarities and demarcation document.  Мисията на ЕС: Възстановяване на нашия океан и води до 2030 г. ще бъде подкрепена от ЕФМДРА чрез следните действия, допринасящи в синхрон с Хоризонт Европа за следните цели: събиране на морски отпадъци и изгубени риболовни уреди, декарбонизация на риболовните кораби, действия по задължението за разтоварване, използване на енергийно ефективни решения и възобновяеми ресурси в риболова и аквакултурите, рециркулационни системи, инвестиции в селективни уреди, подкрепа за мрежата от морски защитени зони, разработване и изпълнение на планове за управление на морските защитени зони, научни изследвания и проучвания и сътрудничество между рибари, изследователи и други заинтересовани страни. |
| 3. The Bulgarian authorities are invited to include in the EMFAF Programme Strategy the information on the Programme’s contribution to environmental and climate change in line with ANNEX IV of the Regulation (EU) 2021/1139. | The contribution of the MFP to the environment and climate change is BGN 75 983 229, the EMFAF or 48.66 % of the budget. | BG is kindly requested to provide the figure in EUR. | Fulfilled  Приносът на ПМДРА към околната среда и изменението на климата е 38 850 204 евро ЕФМДРА или 48,66% от бюджета. |
| 4. The Bulgarian authorities are invited to add to the chapter on the Programme's Complementarities with other Programmes, Funds, Union Instruments (including the specific activities) the synergies with Digital Europe and CEF2, if applicable. | A reference to Digital Europe is added in the Programme’s Strategy section - chapter on complementarities.  A reference to Digital Europe is added also in the Complementarities and Demarcation document (submitted formally with the programme via SFC2021):  **Digital Europe programme**  Digital Europe aims to teach people how to use new technologies. By upgrading skills to work with new technologies through retraining, investing in digital skills and continuing education. The BG EMFAF Programme will ensure synergies in the achievement of the general objectives by:   * retraining of workers in fishing and diversification of their activities; * developing digital skills and dealing with the new technologies of the administration, which is responsible for control and enforcement on the one hand and operators in the sector on the other; * training to improve the digital skills of those working in aquaculture farms and processing plants; * under the CLLD approach, it will promote the digital skills of young people, women and older people over 54 years old within local communities.   Please note that CEF2 is not applicable to the priorities of Bulgarian EMFAF Programme. | OK – NO FOLLOW UP |  |
| 5. The Bulgarian authorities are invited to reformulate wording in relation to multi-purpose maritime operations (p.43) to take duly into account European agencies, so as to read: “21. improved cooperation with national institutions, European (EFCA, EMSA, FRONTEX) and international agencies in the context of the multi-purpose maritime operation in the Black Sea”. | Fulfilled.  The wording is reformulated as follows:  21. Improved cooperation with national institutions, European institutions (EFCA, EMSA, FRONTEX) and international agencies in the context of the multi-purpose maritime operation in the Black Sea. | BG is kindly asked to replace the words ‘European institutions’ with ‘European agencies’. | Fulfilled.  **21. Подобрено сътрудничество с национални институции, европейски агенции (EFCA, EMSA, FRONTEX) и международни агенции в контекста на многоцелевата морска операция в Черно море;** |
| **Priority 1 – Fostering sustainable fisheries and the restoration and conservation of aquatic biological resources** |  |  |  |
| ***Specific Objective 1.1 – Strengthening economically, socially and institutionally sustainable fishing activities*** |  |  |  |
| 6. The fishing capacity of the Bulgarian fleet is not balanced with the available fishing opportunities. At the same time, there is a need to accelerate the energy transition of the fishing sector. Therefore, we strongly recommend Bulgaria to further consider actions on energy efficiency and decarbonisation of fishing vessels in the Specific Objective 1.1, in view of the rapidly changing environment and the raising needs for energy efficiency.  In particular, the Bulgarian authorities are invited to consider adding activities, such as:  - pilot projects, studies, trials and innovations, energy efficiency audits etc., which are not conditional upon the balance of the fleet segment as those under the Specific Objective 1.2 (engine replacement/modernisation),  - technologies to improve vessel structure and on-board equipment, like hull and propeller improvements, improved propulsion and auxiliary engines, improved fuel performance, LED lighting, alternative refrigerants, and assisted fishing,  - strategies to improve the fishing in operation, such as route optimisation, on board fuel control and monitoring, and slow steaming,  - fishing gear technologies to reduce fuel consumption, like new netting and gear designs that reduce drag, fishing gears that improve catch efficiency. | Fulfilled.  In SO 1.1 the following text is added:  **Actions accelerating the energy transition of the fishing sector.**  **Activities for energy efficiency and decarbonisation of fishing vessels will be supported in view of a rapidly changing environment and increasing needs for energy efficiency:**  **-pilot projects, studies, trials and innovations and energy efficiency audits**  **-technologies to improve vessel structure and on-board equipment, propulsion and auxiliary engine improvements for energy efficiency, LED lighting, alternative refrigerants**  **-actions to improve current fishing – optimising the route and course of vessels, fishing gear technologies to reduce fuel consumption.**  In addition to MA added and an additional condition in TOA concerning the support to improve the economic and social status of fishing operators:  Support will be given **to activities that do not increase the gross tonnage of** fishing vessels and do **not depend on the balance of the fishing fleet.** | OK – NO FOLLOW UP |  |
| 7. The Bulgarian authorities are invited to add to the expected results the following wording (p.86) - help the decarbonisation process of sectors and increase their resilience. | Fulfilled.  In SO 1.1 the following text is amended:  Expected outcomes:  Enabling a modern and competitive fishing fleet, an opportunity to increase the income of operators, in particular those of the small-scale fishing fleet (the most vulnerable group), **supporting the decarbonisation process and making the fleet more sustainable.** | OK – NO FOLLOW UP |  |
| ***Specific objective 1.3 – Promoting the adjustment of fishing capacity to fishing opportunities in cases of permanent cessation of fishing activities and submitting to a fair standard of living in cases of temporary suspension of fishing activities*** |  |  |  |
| 8. The Bulgarian authorities are invited to specify in the section on temporary cessation that ‘the GFCM measures, obligations and recommendations regarding the Black Sea stocks, (i.e. turbot MAP, etc.)’ are a prerequisite for establishing the conditions for granting compensation ‘and support the conservation measure established by the GFCM recommendations’. The temporary cessation compensation shall assist in supporting operators suffering losses as a result of overwhelming cessation of fishing from conservation measures ‘in the context of GFCM, including spatio-temporal closures.’ | Fulfilled.  The following texts are added in the type of action “Temporary cessation”:   * GFCM measures, obligations and recommendations regarding the Black Sea stocks (e.g. Black Sea Multi Annual Management Plan for turbot) are a prerequisite for establishing the conditions for granting compensation and support the conservation measure established by the GFCM recommendations. The compensation for temporary cessation supports operators suffering losses as a result of overwhelming cessation of fishing from conservation measures in the context of GFCM, including spatio-temporal closures.   and:   * Activities under this specific objective shall support the policies of the CFP and their objectives. | OK – NO FOLLOW UP |  |
| 9. The Bulgarian authorities are invited to provide an additional information on the proposed compensation for the temporary cessation of fishing white mussels in line with the objectives and activities of measure 19 of the national framework for priority actions for Natura 2000 – ‘Improving the conservation status of marine habitat types by supporting the temporary cessation of fishing for white mussel’. Specifically, this means to describe better the actions foreseen, objectives, beneficiaries, areas covered, production (if any historical data is available) and duration of the ban. It is also important to bear in mind that the conditions for compensation under the Article 21 of EMFAF Regulation must be respected. | Fulfilled.  The following text is added in the type of action ‘Temporary cessation of fishing activities’:   * There is currently no ban on whitefish harvesting but there is an active catching of this species. Where such a prohibition relating to the conservation and sustainable exploitation of stocks occurs (pursuant to Article 7 (1) (b) of Regulation (EU) No 1380/2013), the operators concerned will be able to obtain compensation for the loss of profits resulting from the limitation of their activities as a measure to reduce the impact of fishing on the marine environment.   This compensation will only be granted subject to compliance with the rules and conditions of Article 21 of Regulation (EU) 2021/1139. This will simultaneously achieve two objectives: to preserve the economic status of operators fishing for whitefish and to preserve and restore the natural habitats of this species. The exploitation of white mussel species has also a physical impact on the seabed, disrupting its integrity and that of associated communities. Mainly shallow coastal habitats are affected.  The activities identified in the national BG PAF to be financed under this measure are the following:  1. Enabling economic losses to be compensated and helping operators to cease fishing activities from whitefish fishing in the waters of Natura 2000 sites in the event of failure to do so.  The majority of operators fishing whitefish are engaged in this activity with vessels of less than 12m in length, which are not required to be equipped with VMS. It is a condition for granting this compensation that it is granted only to vessels equipped with VMS.  The activity is in line with the operational objectives set for the bottom habitats of the Maritime Spatial Plan of the Republic of Bulgaria 2021-2035.  The protected areas for which the aid is to be granted are defined in the NAP: BG0000100, BG0000103, BG0000116, BG0000146, BG0000154, BG0000242, BG0000573, BG0000574, BG0000620, BG0000621, BG0001001, BG0001004, BG0001007, BG0001500. | OK – NO FOLLOW UP |  |
| 10. The Bulgarian authorities are reminded that regarding permanent cessation, both sub-indicators - CR05.1 / CR05.2 - Capacity of vessels withdrawn (GT/kW) need to be included in the Programme. This is due to the fact that the fleet values need to be reported on both parameters, in line with the Common Fishery Policy Regulation 1380/2013 and the EU Guidelines (COM(2014) 545 final).  Therefore, the Bulgarian authorities are recommended to re-introduce the sub-indicator CR05.2 in the Programme. | Fulfilled.  The sub-indicator CR05.2 is re-introduced with value of 3 311 kW. It is added also in the Performance framework and the Methodology paper documents. | OK – NO FOLLOW UP |  |
| ***Specific objective 1.4 – Fostering efficient fisheries control and enforcement, including controlling against IUU fishing, as well as reliable data for Knowledge based decision-making*** |  |  |  |
| 11. The Bulgarian authorities are invited to add to the paragraph on data collection the following wording in italics (p.86) - The initiatives focus on projects related to the GFCM BlackSea4Fish project as well as avoiding duplication of activities *and funding.* | Fulfilled.  In SO 1.4 the text is amended as follows:  -Focus of GFCM BlackSea4Fish project projects and avoidance of duplication of activities **and funding**, but unimplemented project activities will be transferred to the data collection programme if necessary. | OK – NO FOLLOW UP |  |
| 12. The Bulgarian authorities are invited to provide an explanation for the values of 2024 milestone (4) and 2029 (10) target of the output indicator for data collection and control enforcement as well as for the target value of the result indicator CR15 – control means installed or improved (200). | Fulfilled.  In the Methodology paper is further developed for the indicators mentioned in the observation:  Performance indicators - Control and enforcement  The performance indicator is defined as 6. The intermediate value is set at 3. The budget foreseen for this action is EUR 8 494 470. After analysing historical data from the past programming period, it has been established that a project generally covers more than one investment/activity.  (2) Collection and processing of data for fisheries and aquaculture management and scientific purposes  The implementation indicator was defined by 4 projects up to the end of the programme implementation and the intermediate target was set at 1. The values were defined on the basis of historical data on the projects implemented by EAFA during the past programming period.  The budget foreseen for this action is EUR 4 247 325.  CR 15 Control means installed or improved  The indicator most accurately measures the performance of fisheries control activities. It is measured in cash, which includes all control devices/assets. The installation on board vessels of less than 12 metres of traffic tracking devices will be a mandatory condition with the entry into force of the new Control Regulation. According to the ‘Situation analysis of the situation of the fisheries sector’, the Bulgarian fleet consists of 1841 vessels operating only in the Black Sea. Fishing vessels assigned to small-scale fisheries with an overall length LOA up to 12 m represent 95 % or 1 747 vessels (approximately 1/3 of them are inactive). Even after the introduction of the obligation to install traffic tracking devices on board ships below 12 metres, there will be a transitional period. For this reason, these activities will mainly be implemented in the second half of the programming period. In this respect, the final figure set for the current indicator is 200 units, representing around 11 % of the available fishing fleet below 12 metres. The resulting terminal value takes into account the above circumstances as well as the number of ships below 12 metres in Bulgaria. Account has also been taken of the fact that, as a matter of priority, trackers will be equipped with active fishing vessels. | OK – NO FOLLOW UP |  |
| 13. The Bulgarian authorities are invited to add the reference to STECF under the result indicator - Datasets and advice made available (in the column ‘comments’, as done for the result indicator - Effectiveness of the system for ‘collection, management and use of data’), given that STECF is involved in the evaluation of data transmission issues. | Fulfilled.  The reference to STECF is added under the result indicator - Datasets and advice made available (in the column ‘comments’, as done for the result indicator - Effectiveness of the system for ‘collection, management and use of data’):  **-Information to be provided by the Scientific, Technical and Economic Committee for Fisheries.** | OK – NO FOLLOW UP |  |
| ***Specific objective 1.6 – Contributing to the protection and restoration of aquatic biodiversity and ecosystems*** |  |  |  |
| 14. Following our comment “the Specific Objective 1.6 description’s should also mention and include actions aiming at achieving the Water Framework Directive’s good status objectives by 2027”, the Bulgarian authorities added in the Specific Objective 1.6 “actions aimed at achieving the objectives of good ecological status in line with the Water Framework Directive (e.g. protection and restoration of migratory species, reduction of the impact of rivers on coastal and marine waters)”. We welcome this reference and invite the Bulgarian authorities to provide more concrete detail on the type of actions that will be supported. | Fulfilled.  The text is further developed as follows:  -actions aimed at achieving the objectives of good ecological status in line with the WFD (e.g. conservation and restoration of migratory species by **removing barriers, building bypass for migratory fish;** reducing the impact of rivers on coastal and marine waters **through purification facilities**). | BG is kindly asked to add to the text on page 100 - **through purification facilities -** that is indicated in this table but not included in the Programme. | Fulfilled.  The text **‘through purification facilities’** is added in SO 1.6.   * намаляване на въздействието на реките върху крайбрежните и морските води **чрез пречиствателни съоръжения**; |
| 15. The Bulgarian authorities are invited to justify the inclusion of rapana venosa among the invasive species listed in the type of action under the Programme’s Specific Objective 1.6, as it contradicts the current GFCM recommendation 42/2018/9. | Bulgarian MA has included this type of action having in mind the adopted PAF for Natura 2000 activities, therefore this type of action is part of the EMFAF programme. MA is aware, that according to the GFCM recommendation 42/2018/9 Rapana species is not considered as invasive species. This is the reason in the text of SO 1.6 there is an additional text, as follows:   * The activities will be implemented in line with GFCM recommendations on a precautionary approach to Rapana species stocks in the Black Sea. | OK – NO FOLLOW UP |  |
| 16. The Bulgarian authorities are invited to examine under the Specific Objective 1.6 possibility to introduce a type of action concerning the support for the conservation and management of eels and its recovery in line with the EU legislation. | MA clarification:  Having in mind that the European eel has been rejected in the last 30 years from most habitats in Bulgaria, MA does not consider engaging such measures in the Programme as appropriate at the moment. Alternative in relation to MA’s commitments for CFP instrument, such measures could be introduced when necessary.  The text in the Programme is further streamlined as follows:  Where necessary, support will be given to activities for the conservation and restoration of eel, based on GFCM recommendations and EU law. | OK – NO FOLLOW UP |  |
| 17. The Bulgarian authorities are invited to provide a clearer information how they intend to support, in the context of implementation of the Biodiversity Strategy, the extension of Marine Protected Areas (MPAs) in Bulgarian waters (national and EEZ) from the current percentage (to be specified in the Programme) to the 30% target set out in the Biodiversity Strategy.  In addition, a link could also be made with the 2030 GFCM Strategy adopted in 2021 that develops clear regional and sub-regional objectives regarding fisheries restricted areas, their delineation, monitoring programmes etc.  The Bulgarian authorities are also invited to specify 1) the concrete types of actions that will contribute to this aim and 2) who will implement them, considering that several MPAs related activities are in the remit of the Bulgarian Ministry of Environment.  The possible type of actions that you could introduce in the existing list provided (p.98):   * strengthening the network of MPAs in application of a national strategy for protected areas, * strengthening quality of the existing network of MPAs, * creation and management of fisheries conservation areas in line with GFCM or EU/national measures, * scientific work for conservation objectives of Natura 2000 sites related to MPAs, * scientific work for habitats and birds species related to MPAs, * development and implementation of management plans for MPAs, * development of protective measures for MPAs, * development of nature-based solutions, * raising awareness and supporting fishing stakeholders towards a sustainable activity in the network of MPAs, * studies and research supporting Habitats, Birds and Maritime Spatial Planning Directives contributing to the creation and management of MPAs. | Fulfilled.  The texts in this TOA is fully revised, having in mind the proposed texts:  *Protection of the environmental status of the marine environment*  The long-term conservation of the most valuable and threatened species and types of habitats in the EU is enabled through the establishment of the ecological network Natura 2000. With approximately 35 % of the Natura 2000 site, Bulgaria is one of the top sites in the EU. It outlines the framework to protect valuable species and their habitats and at the same time aims at integrating priorities for protecting biological diversity into economic activities and policies. The Biodiversity Strategy by 2030 is committed to establishing a network of well-managed protected areas **and extending the MPAs (currently 8.30 % compared to the water catchment of BG – national and EEZ) to the 30 % target**. **Biodiversity is important for protecting the** environment and fighting climate change. Specific efforts will be made to protect and restore protected areas, to achieve sustainable development.  Bulgaria’s **objective is to support the achievement of the Biodiversity Strategy** targets. The development of management plans for all MPAs **and the development of protective measures** will be financed under the 2021-2027 Environment Programme. **The development of management plans for fishing activities in the MPA network in accordance with the GFCM or the EU objectives will be implemented through SO 4.1 of the MFP. SO 1.6 will support the restoration and improvement of** the marine and coastal environment by promoting the role of fishermen and scientific institutions in MPAs for their sustainable development.  The designation of protected areas **as well as the implementation of national legislation on habitats and birds** is the responsibility of the Ministry of the Environment and Water, but in synergy with the overall objectives of conservation of species diversity, SO 1.6 will finance activities that help increase, manage and monitor MPAs and Natura 2000 sites:  **-strengthening and improving the quality of the MPA network in the implementation of a national strategy**  -horizontal measures to promote spatial protection of marine protected areas to support biodiversity conservation  -management, restoration, monitoring and monitoring of Natura 2000 sites, taking into account the NPAF and the priority activities identified therein;  -carrying out **scientific activities** for habitats and species of fishing interest to achieve the conservation objectives of Natura 2000 sites **and introducing protective measures**  -raising awareness and supporting **fisheries stakeholders** for sustainable activity in the MPA network, campaigning among citizens  **-deploying nature-based solutions**  -involve fishermen, mainly by the MWD, in the joint management of MPAs and no-fishing zones, as per objective 1. Fisheries and ecosystems. Healthy seas and productive fisheries from the GFCM strategy  -actions aimed at achieving the objectives of good ecological status in line with the WFD (e.g. conservation and restoration of migratory species by **removing barriers, building bypass for migratory fish;** reducing the impact of rivers on coastal and marine waters;  **-where necessary, support will be given to activities for the conservation and restoration of eel, based on GFCM recommendations and EU law)**  **-studies and studies in support of the Habitats Directives and Maritime Spatial Planning, contributing to the establishment and management of MPAs.**  -survey of populations of typical shellfish species under fishing pressure according to Measure 20 of the NAP  -establishment of a Cetaceans Threat Monitoring Centre through remote methods and enhancing the capacity of the responsible state institutions to monitor and effectively control anthropogenic activities that threaten marine cetaceans, Measure 22 of the NDP  -improve the conservation status of marine habitat types by controlling the small size classes Rapana sp. through environmentally-friendly methods of catching and utilising catches for food purposes or for processing outside the food industry, as per Measure 17 of the NRDP.  **The activities will be implemented in line with GFCM recommendations on a precautionary approach to Rapana sp. stocks in the Black Sea.**  MA clarification: Nevertheless activities such as: development and implementation of management plans for MPAs, development of protective measures for MPAs are in the compatibility of the Ministry of environment and/or Program Environment 2021-2027. The activity “creation and management of fisheries conservation areas” is part of SO 4.1 of Bulgarian EMFAF OP. | It is stated in the Specific Objective (SO) 1.6 that ‘the development of management plans for fishing activities in the MPA network in accordance with the GFCM or the EU objectives will be implemented under the SO 4.1’. Based on the information provided in the SO 4.1, our understanding is that you are referring to the implementation of a specific PAF action (measure 16) that refers to development of management plans for MPAs in NATURA 2000. Consequently, we advise you to add to the SO 1.6 the development and implementation of management plans for MPAs outside of NATURA 2000 areas.  This distinction should also be clearly explained in the Programme under the SO 4.1 and SO 1.6.  We advise you to refer to the relevant EMFAF articles 25 (SO 1.6) and 32 (SO 4.1) to better distinguish between the activities linked to these two specific objectives. Normally, SO 1.6 is more flexible in its coverage of actions, while SO 4.1 is more targeted to elements directly linked with marine knowledge, maritime surveillance and coastguard cooperation.  BG is kindly requested to make a clear reference to the Birds and Habitat Directives as well as WFD and Marine Strategy Framework Directive (MSFD) in the SO 1.6 (in the opening paragraph on page 99).  Increasing data quality and sharing through European Marine Observation and Data Network (EMODnet) is foreseen under the SO 4.1. BG is kindly asked to make a clear reference in the SO 4.1 to the European Marine Observation and Data Network (EMODnet).  In your reply to this observation, it is stated that “the activity “creation and management of fisheries conservation areas” is part of SO 4.1 of Bulgarian EMFAF OP.” Can you please clarify where exactly in SO 4.1 is this stated? | The text ‘horizontal measures to promote spatial protection of marine protected areas to support biodiversity conservation’ is revised as follows: ‘популяризацията на пространствената защита на МЗЗ, които да подпомагат опазването на биоразнообразието **на широко публично равнище (напр. публикации в масмедии)’**  The text is revised as follows:  **„**Разработването на планове за управление на всички МЗЗ **и разработването на защитни мерки** ще се финансират по Програмата за околна среда 2021-2027 г. **Разработването на планове за управление на риболовните дейности в мрежата от МЗЗ в съответствие с ГКРСМ или целите на ЕС ще подкрепи възстановяването и подобряването на** състоянието на морската и крайбрежна околна среда.**“**  In addition in the list of activities is added the following one:  **„планове за управление на риболовните дейности на МЗЗ извън Натура 2000“**  In 4.1 ToA is revised according to art. 32:  **Подобряването на природозащитното състояние на морски типове природни местообитания чрез подобряване и насърчаване на знанията за морската среда:**   1. …   **Дейностите са дефинирани в НПРД, Мярка 16.**  Дейностите ще **допринесат за развитие на знанията за морската среда, ще** подпомогнат изпълнението на МППРБ, за изпълнение на рамката за морско пространствено планиране. МППРБ посочва, че в Морската стратегия на Р България са предвидени национални и трансгранични мерки **(включващи акваторията на България и Румъния), създаване на нови представителни** мрежи за, подобряване на състоянието на популациите на мор. бозайници, за намаляване на риболовния натиск чрез прилагане на риболовни техники и оборудване, щадящо околната среда, намаляване на случайния улов на морски бозайници и подобряване на контрола по отношение на хрилните мрежи за калкан. **Ще се осигури качествен обмен на данни чрез EMODnet.**  **Всички действия, посочени по-горе ще допринесат за изпълнението** на СБР за 2030 г., чрез осигуряване на ефективно управление на всички защитени зони, като се определят ясни природозащитни цели, мерки и подходящ мониторинг. **Дейностите ще допринесат за изпълнение на плана за действия на СМСЕС за противодействие на ННН риболов** и противодействие на незаконната експлоатация на природни ресурси.  Дейностите ще допринесат и за международното сътрудничество в Черно море, в частност за изпълнението на ОДНЧМ - чрез обмен на най-добри практики за управление на защитените зони между черноморските държави и чрез повишаване на осведомеността на рибарите и гражданите **и ще осигурят обмен на информация чрез EMODnet.**  **Тhe opening of SO 1.6 is revised as follows:**  В съответствие с РДМС България се ангажира да постигне добро екологично състояние на морските води и ще използва ресурса на ЕФМДРА за операции по събиране на отпадъци и изгубени риболовни уреди. Тези действия ще бъдат подкрепени от повишаване на осведомеността на населението чрез кампании и ще бъдат включени действия за предотвратяване и намаляване на замърсяването на морето от риболова и аквакултурите. За запазване на морското биоразнообразие БГ планира действия, насочени към опазване на екологичното състояние на морската среда и придобиването на знания за качествата на морската среда, свързано с мониторинга на РДМС. **Те ще се изпълняват в синхрон с целите на Директивите на ЕС за птиците и за местообитанията, РДВ и РДМС.** Всички дейности от тази СЦ ще допринесат за постигане на целите на ОДРЧМ и ОПОР, както и на Плана за действие за нулево замърсяване на Черно море от отпадъци до 2030 г. (намаляване на морското замърсяване с 50%, микропластмасата с 30%). Дейностите от НПРД с финансиране от ЕФМДРА са включени.  In the text is added information, that distinguishes the actions under SO 4.1 and SO 1.6 (see above) |
| **Priority 2 – Fostering sustainable aquaculture activities, and processing and marketing of fishery and aquaculture products, thus contributing to food security in the Union** |  |  |  |
| ***Specific Objective 2.1 – Promoting sustainable aquaculture activities, rigorously strengthening the competitiveness of aquaculture production, while strengthening that the activities are inherently sustainable in the long term*** |  |  |  |
| 18. The Bulgarian authorities are invited to clarify the budget allocation for Natura 2000 Priority Action Framework (PAF) related measures included in the EMFAF Programme.  According to our calculations, the budget indicated in the EMFAF Programme seems lower than resources foreseen in the PAF for the Programme (this also depends on what exact actions are foreseen under Specific objective 2.1). | MA clarification:  Bulgaria sets itself an ambitious goal through the PMDRA 2021-2027 to preserve, stabilise and modernize aquaculture farms, emphasising on investments related to increasing energy efficiency, applying technologies improving water quality and use with lower impact on the environment. Aquaculture production will be increased in conditions of sustainable growth, while at the same time promoting the transition of aquaculture farms to green production in line with the objectives of the European Green Deal.  The investments under Priority 2 will result in an increase of the volume of produced aquaculture (including biological/organic production). This production will have a lower carbon footprint. One third of the supported farms will improve the water quality and decrease water use and also increase the use of renewable energy. About 30 farms will introduce product innovations and innovations in the production process, including digitisation of processes. About 10% of the supported farms will improve the traceability of their products.  The expected number of supported farms is 94. The planned budget for this activity is EUR 20.247.372 of EMFAF.  The team from the Ministry of Environment, engaged in the development of the PAF 2021-2027, is part of the working thematic group for the development of the EMFAF Programme and was involved and informed at every stage of the development of the Programme and took part in all discussions with the representatives of the fisheries sector.  A numerous working groups and meetings both with the experts from the Ministry of Environment and representatives of the fisheries sector were held and details of the activities and types of operations included in the Programme and PAF were specified, as well as the budgets set for them. During the public consultation of the PAF 2021-2027 the MA expressed a clear opinion on the agreements already reached in writing. In the table reflecting the comments on the PAF 2021-2027, it is clearly indicated that the comments were accepted but probably as a result of a technical error, the budget in the final version of the PAF 2021-2027 remained unchanged.  The EMFAF Programme will contribute to PAF with the total 6 494 900,00 EUR EMFAF. | To ensure consistency throughout the Programme, BG is kindly asked to delete all referenced PAF amounts in the programme text. However, BG is invited to mention in the relevant part of the BG EMFAF Programme (Strategy) the overall contribution to the BG PAF in EUR.  BG is kindly requested to include in the Programme a clear reference to the EU Marine Strategy Framework Directive 2008/56/EC (MSFD), and its overarching objective of reaching “good environmental status” (see text added in the Programme on page 11 and 15). | Fulfilled.  The overall contribution to the BG PAF in EUR is mentioned in the Strategy section:  **Приносът на ПМДРА към околната среда и изменението на климата е 38 850 204 евро ЕФМДРА или 48,66% от бюджета, към НПРД Натура 2000 е 6 494 900 евро ЕФМДРА.**  В съответствие с РДМС **2008/56/EC**…  Други основни документи, залегнали при разработването на П4, свързани с опазването на морската околна среда са РДМС **2008/56/EC**… |
| 19. Given the ambitious expected results of the Specific Objective 2.1, the Bulgarian authorities are invited to clarify the scope of the aquaculture actions foreseen under this Specific Objective and their relation to the following BG PAF measures: Measure 58: Secure safe feeding grounds for protected bird species in the habitats of which aquaculture farms are developed and Measure 65: Enhance conservation state of species and habitat types through transition to biological aquacultures. | MA clarification:  During the two previous programming periods, only 6 aquaculture farms benefited from support for the provision of environmental services. In this programming period, the ambitions are to avoid the delays from the previous periods and to start the activities under provision of environmental services operations immediately after the approval of the Programme. This will allow all aquaculture farms falling within the area covered by the NATURA 2000 network to benefit from the compensations for losses caused by predators thus contributing to the preservation and improvement of the habitats of birds and other aquatic animals within the farms throughout the whole programming period.  Through the implementation of the activity ‘Aquaculture providing environmental services’ nearly 30 km2 of the territory of the farms located in the NATURA 2000 zones will be a subject of support for the preservation of biological diversity and habitats of species. At least 14 farms will be supported. The planned activities correspond to PAF measure 58. EUR 4.110.000 of EMFAF support will contribute to the achievement of the goals set in the PAF.  Activities for certification of aquaculture farms for organic fish farming are foreseen under Specific Objective 2.1 (incl. acquisition of certificates for protected geographical region, origin and quality of products, e.g. for products produced in a clean area or under certain specific conditions, etc.). All organic aquaculture farms are eligible to benefit from the operations under ‘Productive investments in aquaculture’ activity. The aim is to increase the consumption of organic aquaculture in relation to the goals set in the PAF measure 66. EUR 245.000 of EMFAF support will contribute to the achievement of the goals set in the PAF for organic production. | BG is kindly asked to add to the Programme the following (page 114 of the EN version of the Programme):  ‘Relevant type of actions under Specific Objective 2.1 will take into consideration policy orientations set out in the PAF measures 58 and 65.’  Please use the correct reference to the BG PAF measure 65 and not 66.  To ensure consistency throughout the Programme, BG is kindly asked to delete all referenced PAF amounts in the programme text. However, BG is invited to mention the BG EMFAF programme overall contribution to the BG PAF in EUR the Programme’s Strategy section. | Fulfilled.  The correct PAF measure numbers are 58 and 66. Below, please, find attached the adopted BG PAF and link to the Ministry of Environment:        Мярка 58: Осигуряване на спокойствие и условия за хранене в оптимални местообитания на защитени видове рибоядните животни и птици, в чиито местообитания е разположено стопанството за производство на аквакултури  Мярка 66: Подобряване на състоянието на типове природни местообитания и видове чрез преминаване към биологични аквакултури  For the overall contribution to the BG PAF in EUR in the Programme’s Strategy section, see comment 18. |
| 20. We welcome that the Programme supports under the Specific Objective 2.1 several actions to increase the sustainability of aquaculture farms. Bulgarian authorities are invited to specify in the Programme that all investments will be compliant with the Water Framework Directive. | Fulfilled.  The following wording was added to the Programme’s Specific Objective 2.1:  **All investments will comply with the Water Framework Directive.** | BG is kindly asked to add a reference also to the Birds and Habitats Directive (see track changes on page 114 of the Programme’s EN version). | Fulfilled.  **Всички инвестиции ще са в съответствие с РДВ, Директивата за птиците и Директивата за местообитанията.** |
| 21. The Bulgarian authorities are invited to state in the Programme’s section ‘Indication of the specific territories targeted, including the planned use of territorial tools’ that types of actions supported under the Specific Objectives 2.1 and 2.2 will be implemented in all regions of Bulgaria. | Fulfilled.  **SO2.1**  **Activity: Productive investments and innovation in aquaculture will be implemented throughout the country.**  **SO2.2**  **Activities: Processing of fishery and aquaculture products, marketing and production and marketing plans will take place throughout the country.** | OK – NO FOLLOW UP |  |
| ***Specific objective 2.2 – Promoting marketing, quality and value added of fishery and aquaculture products, as well as processing of toxic products*** |  |  |  |
| 22. The Bulgarian authorities are invited to add in the types of actions regarding processing of fishery and aquaculture products the following wording in italics (p. 121) - improving the recovery of processing by-products *in the context of circular economy.* | Fulfilled.   * improving the recovery of processing by-products **(*in the context of the circular economy*);** | OK – NO FOLLOW UP |  |
| 23. The Bulgarian authorities are invited to include in the types of actions under the Specific Objective 2.2 the relevant compensation actions for fisheries, aquaculture and processing sector that cover crisis measures provided for in Article 26 of the EMFAF Regulation. | Fulfilled.  **Compensation is eligible in the event of exceptional events causing significant disturbances on the markets for operators in the fisheries sector, pursuant to Commission decisions issued pursuant to Article 26 of Regulation 2021/1139.** | OK – NO FOLLOW UP |  |
| 24. The Bulgarian authorities are invited to state briefly the type of initiatives that Producer Organisations will carry out to protect the environment and preserve biodiversity in the Black Sea, including in Natura 2000 areas. | Fulfilled.   * **supporting initiatives to protect the environment and biodiversity in HM, including Natura 2000 areas (including: waste collection, information campaigns, training for fishermen, young people and children, knowledge sharing, etc.);** | OK – NO FOLLOW UP |  |
| **Priority 3 – Enabling a sustainable blue economy in coastal, island and inland areas, and fostering the development of fishing and aquaculture communities** |  |  |  |
| ***Specific Objective 3.1. — Enabling a sustainable blue economy in coastal, island and inland areas, and promoting the sustainable development of fishing and aquaculture communities*** |  |  |  |
| 25. The Bulgarian authorities are invited to add to the Priority 3 (CLLD) the following wording in italics - promoting social well-being and preserving cultural heritage *(including natural and underwater heritage).* | Fulfilled.  Local development strategies will implement operations to promote diversification in local communities, develop and preserve economic, human, social and cultural values **(including natural and underwater heritage)**, protect the environment and seize the opportunities of local communities, add value and foster innovation at all stages of the supply chain for fishery and aquaculture products, etc. | OK – NO FOLLOW UP |  |
| 26. The Bulgarian authorities are invited to correct the reference to the LAGs under the European Agricultural Fund for Rural Development, currently referred to as ‘EMFAF LAGs’. | Fulfilled. | BG is kindly asked to correct the reference to the EAFRD LAGs on page 137 (see text added in track changes in the Programme). | Fulfilled.  МИГ по ЕФМДРА ще си партнират с МИГ по **ЕЗФРСР** като изпълняват съвместни проекти за сътрудничество, съвместни мероприятия за изграждане на капацитет, популяризиране на подхода, споделяне на добри практики и популяризиране на постигнати резултати. |
| 27. The Bulgarian authorities are advised to rephrase the wording of the section on the implementation of CLLD strategies, since the present phrasing suggest that all type of actions listed must be implemented by LAGs. This approach seems restrictive and may prove counterproductive, as the needs of individual EMFAF LAGs could vary and it does not leave the local community enough scope to make strategic choices. | Fulfilled.  To achieve the objectives of the Green Transition, local development strategies **may** include activities to support:....  For the recovery and resilience of the territory, local development strategies **may** include activities to support:....  To achieve the objectives of the Digital Transition, local development strategies **may** include support activities for:........ | OK – NO FOLLOW UP |  |
| 28. The Bulgarian authorities are invited to justify the contribution of ‘the purchase or rental of a car, fuel and servicing’ (included in the running costs under the Specific Objective 3.1) to the EMFAF Priority 3 objectives, the overall CLLD implementation in Bulgaria and to the desired end result. | MA clarification:  In order to remedy the daily work of the LAG teams the use of car (purported or rented) is essential as the territorial of the fishing communities in which the CLLD approach is implemented is extensive and in some places. Transport links are not well developed in large parts of the fishing areas and in practice there is no way to ensure easy access to complete the daily tasks of the LAG team. In this period we are counting an increase of the covered territory and the number of the LAGs.  The daily work of the teams of the LAGs involving participation in meetings, information days, jobs, site visits, assistance to potential and actual beneficiaries, cooperation activities and many others. The car will be used only by the members of the LAG teams and will be strictly linked to LAG activities.  The implementation of local development strategies and the CLLD approach as a whole can be addressed without the possibility to Rely on a car for the needs of the LAGs.  During previous programme periods car purchase or rent was eligible. | BG is kindly requested to delete the reference of the purchase or rental of a car, fuel and servicing.  Please note that operational costs are eligible expenditure only if they form part of an operation that contributes to a specific objective. Operational costs not linked to the achievement of the objective of the operation are not eligible expenditure. | Fulfilled.  The note regarding ‘trainings to increase the administrative capacity of the LAG team for the implementation of the local development strategy’ is taken into account and will be further developed and restricted according to the received comment in the Application conditions documents. Trainings will be strictly linked to the implementation of the strategies. |
| 29. The Commission welcomes that for CLLD development the Bulgarian authorities will take into consideration smart specialisation strategies on blue economy. S3 is a key tool to prioritise research and innovation investments in blue economy sectors. | Fulfilled. | OK - NO FOLLOW UP |  |
| **SECTION 4 ENABLING CONDITIONS** |  |  |  |
| 30. The Commission services confirm that they consider the horizontal enabling conditions (HECs) 1, 2, 3 and 4 fulfilled. | Fulfilled. | BG is kindly reminded to ensure that the very final text of the HECs, as agreed between COM and the BG Authorities, is specified in the Programme. | Fulfilled.  The text in the HECs section related to the Decree of the Council of Ministers regarding the Monitoring Committee is updated. |
| **SECTION 7 COMMUNICAITON AND VISIBILITY** |  |  |  |
| 31. The Bulgarian authorities are recommended to review and identify satisfactory Key Performance Indicators (KPIs) that can help monitor and asses the performance of the communication activities plan.  Please note that the proposed indicator – “No. of publications” is not a KPI but an output indicator, as it aims at quantifying and not at assessing the performance of a communication action.  Instead, some adequate KPIs can be a number of readers, reach on social media, number of attendees at an event, number of posts engagements on social media. | Fulfilled  **Media:** Media participations, production of information and advertising, audio/video material, banners, etc., purchase of transmission time/advertising spaces, etc.  **Indicators: number of persons reached by communication activities (readers/ viewers)** | OK – NO FOLLOW UP |  |
| **SECTION 8 USE OF UNIT COSTS, LUMP SUMS, FLAST RATES AND FINANCING NOT LINKED TO COSTS** |  |  |  |
| 32. Bulgaria has assured in its reply to the Commission’s informal observations that it will consult the Bulgarian Audit Authority (AA) on all compensation methodologies. Such consultation is essential, in order to prevent as much as possible the implementation problems with compensations. The Bulgarian authorities are recommended to ensure prior cooperation between the MA and AA, before the approval of the Guidelines for Applicants in the EMFAF Monitoring Committee, always respecting that the AA is an independent body. | **Note taken.** All compensation methodologies  Have been sent for review and consultation to the Bulgarian Audit Authority (AA) on 21.07.2022. | OK - NO FOLLOW UP |  |
| **Resolving of technical errors by MA** |  |  |  |
| Amendment of the value of CR11 Entities creating social sustainability | From 75 to 20. The amendment is made according to the Monitoring Evaluation Framework guidance. The amendment is referred to in SFC and Performance Framework documents.  **Fishery cooperatives and female clubs will be formed in the territories of coastal groups to provide employment for people over 54.** | Please note that the Famenet working paper on the Monitoring Evaluation Framework uses the ‘cooperative of fishers and a women’s club in a coastal community’ only as an example at the operation level *(The beneficiary, a FLAG, helps a cooperative of fishers and a women’s club in a coastal community to develop a job swapping mechanism for seasonal jobs to increase the employment of people over 54. The beneficiary reports two entities increasing social sustainability (the fishers’ cooperative and the women’s club).*  Consequently, BG is kindly requested to amend the result indicator CR11 by considering all 15 EMFAF LAGs and not taking into account only the coastal LAGs but also the inland LAGs. You will avoid in that way unintentional discrimination of these LAGs, as they too are ‘the entities creating social sustainability’. Please remember to amend also the methodology paper and any other relevel part of the Programme. | Fulfilled.  Comment taken into account, the indicator value is adjusted from 20 to 30, including the inland LAGs. The amendment is reflected both in SFC and Performance framework documents.  **На територията на всяка местна група ще се формира рибарски кооператив и женски клуб.** |
| Amendment of target groups for TA Marketing measures under SO2.2. | The **Ministry of Agriculture** is added in section Main target groups for TA Marketing measures under SO2.2. | OK - NO FOLLOW UP |  |
| In Strategy section for Priority 4 text amended as follow: |  |  | **В рамките на П4, ЕФМДРА ще подкрепя дейности, които ще укрепят устойчивото управление на Черно море чрез насърчаване на морските познания с цел подобряване на знанията за състоянието на морската среда, насърчаване на морското наблюдение чрез подкрепа на действия, допринасящи за постигане на целите на ОСОИ, насърчаване на сътрудничеството на бреговата охрана в рамките на EUROSUR и повишаване на качеството на данните и споделянето им чрез EMODnet.**  **Сътрудничеството в рамките на ОДРЧМ е свързано с приемането на модели на кръгова икономика, за да се гарантира защитата и устойчивостта на морската екосистема, да се насърчи производството, управлението и споделянето на морска и крайбрежна информация за ефективно наблюдение на околната среда.**  **Предприети мерки и очаквани резултати.**  **Ще бъдат надградени дейностите, предприети в периода 2020-2014 г. и в частност морското наблюдение по проекта InBulMarS.**  **Дейностите по П4 ще допринесат към достъпността и обмена на информация в ЧМ, чрез развитието на проекта InBulMarS по целите на ОСОИ подобрят еко среда и наличието на рибни ресурси чрез развитие на знанията за морската среда.**  През периода 2014-2020 УО е идентифицирал празноти в **нац.** норм. рамка – ЗБР, които **възпрепятстваше развитието на** защитените зони. **Това доведе до прекратяване на мярката** за периода 2014-2020, но през настоящия програмен период се планират дейности по подобряване на природозащитното състояние чрез внедряването на нови знания, които ще са основа за управление на риболовните дейности в МЗЗ.  **Подкрепените дейности ще доведат до по-добро опазване на морската среда, ще възстановят биолог. разнообразие, ще подобрят познаването на състоянието на ЧМ и ще сведат до минимум въздействията върху защитените видове в съответствие с АРМБ. Те също така ще помогнат за запазване на морското биоразнообразие и постигане на добро еко състояние на водите на ЧМ в съответствие с MSFD 2008/56/EU, ДПМ и Решението на Комисията за добро състояние на окол. среда.**  Принос към ХП на ЕС.  Дейностите, залегнали в **П4** също са насочени към постигането на конкретни цели на ХП - ЕЗП, ФТ, СБР**,** СР и др.  Целите на ЕЗП, ще се постигнат чрез разширяване обхвата на инф., през системата за обмен на данни по стандарта на ОСОИ. Извършването на контрол върху риболовните дейности ще спомогне за предотвратяването на ННН в ЧМ и ще осигури устойчиво управление на морските пространства и нулева толерантност към ННН.  Целите на СБР ще се постигнат чрез подобряване на природозащитното състояние на морските типове природни местообитания чрез контрол върху обилието на инвазивни видове, **намаляване на натиска върху местообитанията и видовете и подпомагане на използването на възобновяема енергия в морето.**  За изпълнението на стратегията ФТ и целите за постигане на устойчиво отглеждане на риба и производство на морски храни е важно да има високо развит мониторинг и контрол на рибарството и усъвършенствана система за проследяване и обмен на данни по стандарта на ОСОИ.  **СР ще се подпомага чрез инвестиции в интегрирано морско наблюдение, чрез надграждане на системата за обмен на данни чрез обмен на информация за рискове и заплахи. Подобряване** на знанието за морската среда и подобряване на достъпа до информация за морето ще допринесат пряко за развитието на СР и СИ, тъй като загубата на биологично разнообразие и сривът на екосистемите застрашават основите на нашата икономика.  **Цифровият преход ще бъде подкрепен чрез инвестиции в подобряване и разпространение на оперативно съвместими морски данни чрез EMODnet, а зеленият преход ще бъде подсилен чрез оптимизиране на пространственото планиране, събиране на научни знания, за да се позволят ефективни управленски решения и прилагане на действия за защита, подпомагане на използването на възобновяема енергия в морето и възстановяване на екосистемите.** |
| In Prioritet 4q section Types of actions text amended as follow: |  |  | **2.Подобряването на природозащитното състояние на морски типове природни местообитания чрез подобряване и насърчаване на знанията за морската среда, включва дейностите:**   * оценка на натиска от риболовни дейности и аквакултури в защитените зони * оценка на въздействието от риболовни дейности и аквакултури върху състоянието на импактни местообитания * анализ на икономическото значение на защитените зоните за сектора * анализ на съществуващите риболовни регулации и мерки, ефективност, изпълнение и спазване * изготвяне на програма от мерки за намаляване на натиска от риболовните дейности и компенсаторни мерки за сектора * изготвяне на план за действие за прилагане на програмата от мерки * консултации със заинтересованите лица.   **Тези дейности са дефинирани в НПРД, Мярка 16.**  **Дейностите по за развитие на знанията за морската среда включват също така:**   1. **Проучвания за въздействие върху околната среда за напредък в морското пространствено планиране за развитие на възможностите за производство на възобновяема енергия в морето.**   Дейностите ще **допринесат за развитие на знанията за морската среда, ще** подпомогнат изпълнението на МППРБ, за изпълнение на рамката за морско пространствено планиране. МППРБ посочва, че в Морската стратегия на Р България са предвидени национални и трансгранични мерки **(включващи акваторията на България и Румъния), създаване на нови представителни** мрежи за, подобряване на състоянието на популациите на мор. бозайници, за намаляване на риболовния натиск чрез прилагане на риболовни техники и оборудване, щадящо околната среда, намаляване на случайния улов на морски бозайници и подобряване на контрола по отношение на хрилните мрежи за калкан. **Ще се осигури качествен обмен на данни чрез EMODnet.**  **Всички действия, посочени по-горе ще допринесат за изпълнението** на СБР за 2030 г., чрез **допринасяне** на ефективно управление на **мор. територии в зоните по Натура 2000 в северното и южното Черноморие на България**, като **се задават** ясни природозащитни цели, мерки и подходящ мониторинг. **Те също така ще дадат своя принос** **за изпълнение на плана за действия на СМСЕС за противодействие на ННН риболов** и противодействие на незаконната експлоатация на природни ресурси.  Дейностите ще допринесат и за международното сътрудничество в Черно море, в частност за изпълнението на ОДНЧМ - чрез обмен на най-добри практики за управление на защитените зони между черноморските държави и чрез повишаване на осведомеността на рибарите и гражданите **и ще осигурят обмен на информация чрез EMODnet.**  Ще се подкрепи една от целите на ЕЗП за опазването и възстановяването на екосистемите и биологичното разнообразие в Черно море, съблюдаването и ефективното прилагане на действащото законодателство и съответните политики. **Проучванията за развитие на възможностите за производство на възобновяема енергия в морето ще спомогнат за декарбонизацията и повишаването на енергийната ефективност.**  **Всички дейности свързани с повишаване на знанията за морската среда допринасят за** постигането на добър екологичен статус на водите на Черно море, съгласно РДВ за опазването на териториалните и морските води и **директивите за хабитатите и птиците.** Така се гарантира устойчивото използване на водите от операторите в сектор рибарство, както и намаляване на замърсяването във водните обекти от риболова и аквакултурите. |